

## STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

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May 12, 2006

Philip M. Small, Esq. Brown Rudnick Berlack Israels LLP CityPlace I, 185 Asylum Street Hartford, CT 06103-3402

RE: **PETITION NO. 755A** – Iroquois Gas Transmission System, L.P. application submitted to the Federal Energy Regulatory Commission to modify the existing interstate natural gas pipeline by the addition of a compressor station off of High Meadow Road in Brookfield, Connecticut.

Dear Attorney Small:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than May 19, 2006. To help expedite the Council's review, please file individual responses as soon as they are available.

Please forward an original and 15 copies to this office. In accordance with the State Solid Waste Management Plan, the Council is requesting that all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Yours very truly,

S. Derek Phelps Executive Director

cc: Council Members Parties & Intervenors



## Petition No. 755A Iroquois Gas Transmission System, L.P. Brookfield, CT Interrogatories

- 1. Describe in detail the specific safeguards that it has incorporated in its existing procedures, programs and equipment, to minimize the chance of the documented incidents occurring at the Brookfield facility. Include in your response the 'lightning' protection safeguards that will be included in the design of the compressor station and its environs.
- 2. Provide details of the training sessions previously provided to the volunteer fire department in Brookfield, and specify any additional scope of training that will be included to deal with the compressor station addition.
- 3. Describe the monitoring and containment provisions that will be incorporated in the design of the project to detect a potential spill of oil during operation of the compressor facility, given the large volumes of lubricating/cooling oil circulating within the gas turbine and compressor equipment enclosure, and the oil within the elevated gearboxes associated with the gas cooler structure.
- 4. Describe what safeguards Iroquois will provide to address the reliability and safety of operation of the outdoor elevated gas cooler equipment, as it regards to hazardous gas and fire detection/suppression provisions, given that the gas coolers will incorporate eight (8) electric motor driven fans [and associated oil-filled gearboxes] according to Resource Report 1, General Project Description. Describe any other area monitoring to detect and alarm in the event of any gas release from outdoor equipment.
- 5. When will Iroquois have a draft version of the Emergency Plan, specifically prepared for the Brookfield project, available for review and comment? In the interim, provide a copy of the Emergency Plan prepared for the Athens, New York compressor station project.
- 6. Provide an analysis evaluating the feasibility of using selective catalytic reduction (SCR) and oxidation catalysts to further reduce NO<sub>X</sub> and CO emissions from the gas turbine proposed for the compressor station.
- 7. What are the estimated ambient impacts due to emissions from operation of the compressor station at the nearest residences and at Whisconier Middle School? Provide results of the ambient impact modeling analysis at receptors specifically corresponding to the nearest residences and the Whisconier Middle School.
- 8. Estimate the number of yearly releases from any scheduled gas venting from the compressor station facility, and the quantity of volatile organic compounds (VOCs) released per blow down.
- 9. Are there unscheduled gas venting occurrences? What factors would cause such venting?
- 10. Please confirm that the compressor station will not include construction of any odorization facilities.
- 11. Provide an evaluation of the modeled hazardous air pollutant impacts at specific receptors corresponding to nearby residences and the Whisconier Middle School, given that nearby residences and the Whisconier Middle School are located at receptors with terrain higher than the proposed stack top.

- 12. Describe site-specific measures to minimize fugitive dust from construction activities on the nearby school and residences.
- 13. Describe the anticipated construction schedule, including hours per day, days per week and total construction weeks. Provide an estimate of types and maximum quantity of emissions anticipated from all construction activities.
- 14. Please provide list of codes and standards that will apply for design and operation of, given that federal standards do not apply:
  - a. Combustion gas turbine
  - b. Emergency generator
  - c. Lightning protection
  - d. Ground mat system
  - e. Fire pump (as applicable)
  - f. Ventilation system
  - g. DC and essential AC systems
- 15. Would Iroquois include the provision of a fire pump, water fire hose or hydrant equipment as part of the proposed project?
- 16. What is the proposed size and type of emergency generator? Would this be adequate to run the proposed facility in the event of a longer term power failure? Provide the maintenance protocol.
- 17. Please verify the "area classification" for each building, keeping in mind the protection against static electricity, lightning protection hazard, ventilation failure and utility failure while the gas turbine-compressor unit and pipelines are in operation.
- 18. Was a sound level survey conducted at the Vale Road alternate site?
- 19. Why did the assessment not include the noise emissions based on equipment type and size for analytical predictions, manufacturers' sound data for actual or similar equipment, or a sound survey of one of more plants with similar equipment type and size?
- 20. Would the equipment sound levels be specified to meet a total of 40 dBA instead of 45 dBA? If the gas cooler sound level of 35 dBA at 100 meters (328 ft) is considered "feasible noise control", would meeting 27 dBA for all of the listed equipment or noise sources listed in Table 9.4.3.1-1 also be considered to be based on "feasible noise control"?
- 21. What is the estimated sound level at a specified distance, duration, time of day, and number of days per year of silenced atmospheric gas release for normal operations?
- 22. What is the estimated sound level, duration, time of day, and number of days per year of unsilenced atmospheric gas release for plant startup or emergency blow down?

- 23. Has the State of Connecticut provided an opinion on whether either or both silenced and unsilenced atmospheric gas releases are exempt from Connecticut Noise Control Regulations? Has an evaluation of prominent discrete tones based on ambient sound data and equipment sound spectra concluded that "normal operation of the proposed equipment is not expected to produce any sounds that would fall under this portion of the regulation" in reference to Connecticut Noise Control Regulations?
- 24. Will the measured third octave band sound pressure level data be used to evaluate prominent discrete tones (refer to Section 9.4.3.4) from gas turbine, compressor, and gas cooler fans?
- 25. This facility was clearly audible on the morning of May 8, 2006 during a site visit. Was the gas metering facility not operating on the day of the LSGA sound survey?
- 26. Highway traffic on I-84 was identified as the dominant noise source. Why were the sound levels at NSA-3A lower than NSA-1A which is further from the highway?
- 27. Were the sound levels at NSA-2A lower than NSA-1A because it was further from the highway noise, or further from the existing gas metering facility noise?
- 28. If the sound levels at NSA-1A already exceed 45 dBA and the dominate noise source was the existing gas metering facility, then does the project intend to reduce the sound levels of the existing facility?
- 29. How can the technical feasibility and cost of low noise equipment or added noise control materials be evaluated to meet 45 dBA at the nearest NSA without an estimate of the noise emissions of the proposed equipment? Why was plant design information unavailable to estimate noise emissions based on: equipment type and size for analytical predictions, manufacturers' sound data for actual or similar equipment, or a sound survey of one of more plants with similar equipment type and size?
- 30. In view of the concern for maximizing safety and avoiding air emissions in the area of Whisconier Middle School, what would be the advantages and disadvantages of using an electric motor prime mover instead of a gas turbine prime mover?
- 31. In evaluating the feasibility of utilizing the alternate site has the potential recovery of the waste heat from the gas turbine exhaust been considered for utilization as a saleable energy stream?
- 32. Is Iroquois willing to consider exploring options with the Town of Brookfield to evaluate potential commercial/industrial thermal uses co-located at the Vale Road site?
- 33. How many lightning strikes have caused damage to the gas pipeline infrastructure? What kind of damage?
- 34. Is it possible to lower the turbine floor 5 -10 feet to reduce visibility of the structure?